



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JPL  
F. #2021R00671

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 9, 2024

By ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Charlie Zaki Abujudeh  
Criminal Docket No. 22-161 (PKC)

Dear Judge Chen:

The government writes in response to the Court's July 8, 2024 Order concerning the defendant Charlie Zaki Abujudeh's motion for return of property. ECF Dkt. 52. Abujudeh since amended his motion and withdrew his request for an order lifting a preliminary injunction freezing certain assets. ECF Dkt. 53.<sup>1</sup> Because Abujudeh has paid more than \$5 million in disgorgement, interest and penalties to the Securities and Exchange Commission in connection with the judgment entered against him in the parallel civil proceeding, which amount well exceeds the forfeiture money judgment in this case, and because the SEC will be implementing a claims process to distribute from that disgorgement restitution payments to victims, Abujudeh's restitution and forfeiture should be deemed satisfied in this case. The government has also confirmed that Abujudeh paid the \$100 special assessment on April 9, 2024.

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<sup>1</sup> The proposed order initially filed by Abujudeh in error, ECF Dkt. 52-1, sought relief in connection with a preliminary injunction relevant to the parallel civil case, Securities and Exchange Commission v. Abujudeh, No. 21-CV-4110 (PKC). In light of Abujudeh's amended motion, that request as it relates to this case is now moot.

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